



65 Route 4 East
River Edge, New Jersey 07661
t: 201.441.9056
f: 201.441.9435
www.hdrbb.com

July 26, 2012

VIA ECF ONLY

Honorable Stanley R. Chesler
United States District Judge
United States Courthouse
Federal Square
Newark, NJ 07101

New York Office
565 Fifth Avenue, 7th Floor
New York, New York 10017
t: 212.344.4619

Short Hills Office
51 JFK Parkway, Suite 245
Short Hills, New Jersey 07078
t: 973.467.1325

**Re: USA v. Nowak & Cichy
Criminal No. 10-633 (SRC)**

Dear Judge Chesler:

Please accept this letter in lieu of a more formal motion requesting an extension of time within which to file pretrial motions on behalf of Defendant Zbigniew Cichy. Those motions presently are due on July 27, 2012. For the reasons set forth below, we respectfully request an extension until October 31, 2012.

As the Court has experienced, Defendants Nowak and Cichy have been actively involved in their defense. Since we were last in Court, I have had extensive correspondence with Defendant Cichy regarding the issues to be raised in the pretrial motions we intend to file. Those conversations, which are continuing, hopefully will result in more focused motions. In addition, Defendant's anticipated severance motion requires coordination with Defendant Nowak, which is somewhat more complicated because she is pro sé.

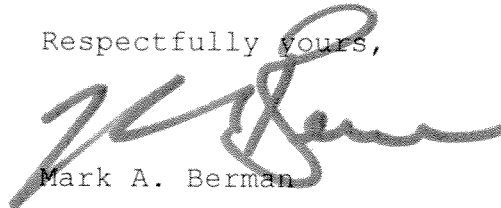
In addition, I have recently returned from a one-week vacation. I have two Third Circuit briefs due in the coming month, on August 15 and August 31. Both appeals are from three-week trials and are likely to consume a significant portion of my time. In September my time in the office will be limited by the Jewish holidays.

For these reasons, we respectfully move the Court to allow both Defendant Cichy and Defendant Nowak to file their pretrial motions on or before October 31, 2012. If the government files a motion to compel handwriting exemplars, we will respond to such motion separately and expeditiously.

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Thank you for your kind consideration of this application.


Respectfully yours,



Mark A. Berman

cc: AUSA Shirley Emehelu (via ECF)
Mr. Zbigniew Cichy (via PDF)

ps noted



OSPJ